

MARKHAM READ ZERNER LLC

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August 7, 2024

VIA ECF ONLY

Honorable Barbara Moses
United States District Court
Southern District of New York
New York, New York 10007

RE: Morgan Art Foundation, Ltd. V. McKenzie, Case 18CV04438

Dear Judge Moses:

I write to report that lead counsel for Michael McKenzie, John Markham, passed away last month and I must seek to withdraw as counsel for Mr. McKenzie in this matter.

I will be appearing for the telephone conference on August 8, 2024 at 10:00 a.m. to further address this matter and the status of the case as ordered.

As will be explained further in a motion pursuant to Local Civil Rule 1.4, I am unable to continue to represent Mr. McKenzie as my law firm is beginning to wind down its practice in the coming months after the loss of Attorney Markham. My remaining law partner, Elizabeth Read, is the widow of Markham and is not admitted in New York and has not otherwise been handling litigation for our firm. I no longer have an associate or a legal assistant as both have moved on to new employment and I will not be continuing as a solo practitioner. I have notified Mr. McKenzie of this circumstance.

Respectfully,

MARKHAM READ ZERNER, LLC

/s/ Bridget A. Zerner

cc: Counsel of Record